

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	
SOURCEWATER, INC.,	)	Case No. 23-30960 (JPN)
	)	
Debtor.	)	Chapter 11, Subchapter V
	)	

**WITNESS AND EXHIBIT LIST**

Judge:	Hon. Jeffrey P. Norman
Hearing Date:	October 19, 2023
Hearing Time:	1:30 p.m. prevailing Central Time
Party's Name:	Energy Debt Holdings LLC
Attorney's Name:	R. J. Shannon
Attorney's Phone:	(713) 714-5770
Nature of Proceeding:	Hearing on: <ul style="list-style-type: none"> <li>• Confirmation of the Debtor's First Amended Plan of Reorganization Pursuant to §1190 of the Bankruptcy Code; and</li> <li>• (Tentative) Debtor's Emergency Motion to Continue Hearing Set for October 19, 2023 at 1:30 p.m. and Set Status Conference</li> </ul>

Energy Debt Holdings LLC ("EDH") hereby submits this witness and exhibit list in connection with the hearing to be held on October 19, 2023, at 1:30 p.m. (Central Standard Time) (the "Hearing").

**WITNESSES**

EDH may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. Joshua Adler;
2. Any witness called or designated by any other party; and
3. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other party.

**EXHIBITS**

EDH may offer for admission into evidence any of the following exhibits, and any exhibit designated by any other party, at the Hearing:

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted /Not Admitted</b>	<b>Disposition</b>
1	EDH Senior Secured Credit Note				
2	EDH Security Agreement				
3	Subordination and Intercreditor Agreement				
4	Debtor's Supplemental UCC-1 Certification [ECF No. 6]				
5	Debtor's Voluntary Petition [ECF No. 1]				
6	Debtor's Notice of Filing Statement of Cash Flows, Profit and Loss Statement, and Balance Sheet for Year Ending December 31, 2022 [ECF No. 33]				
7	Debtor's Notice of Filing Statement of Cash Flows, Profit and Loss Statement, and Balance Sheet for the Period January 1, 2023 – March 17, 2023 [ECF No. 46]				
8	Debtor's Schedules and Statement of Financial Affairs [ECF No. 36]				
9	Liquidation Analysis (Ex. B) to First Amended Plan [ECF No. 159-2]				
10	Liquidation Analysis (Ex. B) to Second Amended Plan [ECF No. 180-2]				
11	Projected Disposable Income (Ex. A) to First Amended Plan [ECF No. 159-1]				
12	Projected Disposable Income (Ex. A) to Second Amended Plan [ECF No. 180-1]				

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted /Not Admitted</b>	<b>Disposition</b>
13	US Patent #10565540				
14	US Patent #11556882				
15	US Patent #10467473				
16	US Patent #10726263				
17	US Patent #10460169				
18	US Patent #10915751				
19	US Patent #10339646				
20	US Patent #11004192				
21	US Patent #11379971				
22	US Patent #10460170				
23	US Patent #10719708				
24	US Patent #10635904				
25	US Patent #11048937				
26	US Patent #10810688				
27	US Patent #10975667				
28	US Patent #11184740				
29	US Patent #11601785				
30	US Patent #11333792				
31	Summary of Patents (Exhibits 13-30)				

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted /Not Admitted</b>	<b>Disposition</b>
32	Energy Debt Holding, LLC's First Set of Interrogatories, Requests, for Production and Requests for Admission to the Debtor Regarding First Amended Plan of Reorganization				
33	Debtor's responses and any responsive documents to Energy Debt Holding, LLC's First Set of Interrogatories, Requests, for Production and Requests for Admission to the Debtor Regarding First Amended Plan of Reorganization (forthcoming) <sup>1</sup>				

EDH reserves the right to supplement, amend or delete any witness and exhibits prior to the Hearing. EDH also reserves the right to (a) ask the Court to take judicial notice of any document, (b) introduce exhibits previously admitted and (c) introduce any exhibit necessary or appropriate to necessary to rebut the testimony of any witnesses called or designated by any other party or an exhibit introduced or designated by any other party.

Dated: October 17, 2023

SHANNON & LEE LLP

/s/ R. J. Shannon

R. J. Shannon

State Bar No. 24108062

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<sup>1</sup> The deadline to respond to EDH's discovery requests was October 13, 2023. The Debtor and EDH have been negotiating regarding certain of the discovery requests and an extension agreed upon. EDH anticipates receiving responses thereto prior to the Hearing.